

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 19-257(1) (MJD/KMM)
	)	
v. Plaintiff,	)	
	)	<b>DEFENDANT'S PRETRIAL MOTION</b>
AMANDA MARIE LETOURNEAU,	)	<b>TO SUPPRESS SEARCH AND</b>
	)	<b>SEIZURE</b>
Defendant.	)	

Amanda Marie Letourneau, by and through her undersigned attorney, and in accordance with her Fourth Amendment protections, hereby moves the Court to suppress the search and seizure of evidence on August 28, 2019 at her home in Danube, Minnesota and in the vehicle registering to her, a 1994 Dodge Stealth, Minnesota License BXE836.

Our grounds are these:

1. Ms. Letourneau had an expectation of privacy in her home and vehicle.
2. The search warrant affidavit for her home omits “highly relevant” information that would have affected a signing magistrate’s probable cause determination.
3. Law enforcement illegally searched Ms. Letourneau’s vehicle when they failed to obtain a warrant to do so.

This motion is based on the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Dated: November 12, 2019

Respectfully submitted,

*s/Shannon Elkins*

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